REMARKS

The Examiner rejected claims 1-6 under 35 U.S.C. §102(b) as allegedly being anticipated by Tyan et al. (U.S. Patent No. 5,893,127).

Applicants respectfully traverse the §102 rejections with the following arguments.

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35 U.S.C. §102(b)

The Examiner rejected claims 1-6 under 35 U.S.C. §102(b) as allegedly being anticipated by Tyan et al. (U.S. Patent No. 5,893,127).

Claim 1

Applicants respectfully contend that Tyan does not anticipate claim 1, because Tyan does not teach each and every feature of claim 1. For example, Tyan does not teach the following feature of claim 1: "creating an HTML table having rows and columns, wherein ... column widths are determined by the spatial coordinates".

The Examiner argues that Tyan, col. 3, lines 4-9 teaches the preceding feature of claim 1 by reciting: "According to one aspect of the invention, an HTML file is generated based on a bitmap image by obtaining two horizontally adjacent blocks in separate vertical columns of the bitmap image, and then generating an HTML file in which the blocks are placed inside table cells by being tagged as data elements in a row of an HTML tagged table."

In response, Applicants maintain that Tyan, col. 3, lines 4-9 teaches that the two horizontally adjacent blocks are each placed in a cell within a row of the HTML tagged table. Therefore, it is clear that the cell dimensions are determined by the spatial coordinates of the two horizontally adjacent blocks. However, Tyan, col. 3, lines 4-9 does not teach the number of columns of the HTML tagged table encompassed by the cell into which the block fits. For example, Tyan, col. 3, lines 4-9 does not teach whether the cell encompasses 1 column, two columns, three columns, etc. of the HTML tagged table. Without knowledge of the number of columns into which the block fits, it is mathematically impossible to determine the column

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widths from knowledge of the spatial coordinates of the two horizontally adjacent blocks.

Based on the preceding arguments, Applicants respectfully maintain that Tyan does not anticipate claim 1, and that claim 1 is in condition for allowance.

Claim 2

Applicants respectfully contend that Tyan does not anticipate claim 2, because Tyan does not teach each and every feature of claim 2. For example, Tyan does not teach the following feature of claim 2: "creating an HTML table having rows and columns, wherein ... column widths are determined by the spatial coordinates".

The Examiner argues that Tyan, col. 3, lines 4-9 teaches the preceding feature of claim 2 by reciting: "According to one aspect of the invention, an HTML file is generated based on a bitmap image by obtaining two horizontally adjacent blocks in separate vertical columns of the bitmap image, and then generating an HTML file in which the blocks are placed inside table cells by being tagged as data elements in a row of an HTML tagged table."

In response, Applicants maintain that Tyan, col. 3, lines 4-9 teaches that the two horizontally adjacent blocks are each placed in a cell within a row of the HTML tagged table. Therefore, it is clear that the cell dimensions are determined by the spatial coordinates of the two horizontally adjacent blocks. However, Tyan, col. 3, lines 4-9 does not teach the number of columns of the HTML tagged table encompassed by the cell into which the block fits. For example, Tyan, col. 3, lines 4-9 does not teach whether the cell encompasses 1 column, two columns, three columns, etc. of the HTML tagged table. Without knowledge of the number of columns into which the block fits, it is mathematically impossible to determine the column

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widths from knowledge of the spatial coordinates of the two horizontally adjacent blocks.

Based on the preceding arguments, Applicants respectfully maintain that Tyan does not anticipate claim 2, and that claim 2 is in condition for allowance.

Claim 3

Applicants respectfully contend that Tyan does not anticipate claim 3, because Tyan does not teach each and every feature of claim 3. For example, Tyan does not teach the following feature of claim 3: "creating an HTML table having rows and columns, wherein column widths are determined by elements of the set of x coordinates".

The Examiner argues that Tyan, col. 13, lines 54-60 teaches the preceding feature of claim 3 by reciting: "Step S509 will now be discussed with reference to FIG. 11B. As shown in FIG. 11B, two general situations might occur in which the block order obtained in step S505 will have to be rearranged to accommodate the way HTML processes table data (i.e., down row by row, in sequence). In each, a row span block is to the right of and horizontally adjacent to a column span block.."

In response, Applicants maintain that the disclosure in Tyan, col. 13, lines 54-60 relates only to the determination of block order and is irrelevant to the preceding feature of claim 3, as explained in the example of Tyan, col. 13, lines 61-67 and Tyan, col. 14, lines 1-7.

Based on the preceding arguments, Applicants respectfully maintain that Tyan does not anticipate claim 3, and that claim 3 is in condition for allowance.

Claim 4

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Applicants respectfully contend that Tyan does not anticipate claim 4, because Tyan does not teach each and every feature of claim 4.

As a first example of why Tyan does not teach each and every feature of claim 4, Tyan does not teach the following feature of claim 4: "for each screen display object of a plurality of screen display objects, determining a plurality of Cartesian coordinate pairs that specify a location of the screen display object".

In relation to said first example, the Examiner argues that Tyan, col. 4, lines 41-46 teaches the preceding feature of claim 4 by reciting: "Based on the layout relationships, a block type is determined for each block, column span and row span for each block is determined, blocks are reordered if needed, and an HTML file is generated based on block type and column and row span information for the blocks."

In response to the Examiner's argument relating to said first example, Applicants maintain that the disclosure in Tyan, col. 4, lines 41-46 relates only column span and row span, which pertain to column and row intervals and not to column and row coordinates.

As a second example of why Tyan does not teach each and every feature of claim 4, Tyan does not teach the following feature of claim 4: "creating an HTML table having rows and columns, wherein column widths are determined by elements of the set of x coordinates".

In relation to said second example, the Examiner argues that Tyan, col. 13, lines 54-60 teaches the preceding feature of claim 4 by reciting: "Step S509 will now be discussed with reference to FIG. 11B. As shown in FIG. 11B, two general situations might occur in which the

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block order obtained in step 5505 will have to be rearranged to accommodate the way HTML

processes table data (i.e., down row by row, in sequence). In each, a row span block is to the right

of and horizontally adjacent to a column span block.."

In response to the Examiner's argument relating to said second example, Applicants

maintain that the disclosure in Tyan, col. 13, lines 54-60 relates only to the determination of

block order and is irrelevant to the preceding feature of claim 4, as explained in the example of

Tyan, col. 13, lines 61-67 and Tyan, col. 14, lines 1-7.

Based on the preceding arguments, Applicants respectfully maintain that Tyan does not

anticipate claim 4, and that claim 4 is in condition for allowance.

Claim 5

Applicants respectfully contend that Tyan does not anticipate claim 5, because Tyan does

not teach each and every feature of claim 5.   For example, Tyan does not teach the following

feature of claim 5: "creating an HTML table having rows and columns, wherein column widths

are determined by differences between consecutive elements of the set of x coordinates".

The Examiner argues that Tyan, col. 13, lines 54-60 teaches the preceding feature of

claim 5 by reciting: "Step S509 will now be discussed with reference to FIG. 11B. As shown in

FIG. 11B, two general situations might occur in which the block order obtained in step 5505 will

have to be rearranged to accommodate the way HTML processes table data (i.e., down row by

row, in sequence). In each, a row span block is to the right of and horizontally adjacent to a

column span block.."

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In response, Applicants maintain that the disclosure in Tyan, col. 13, lines 54-60 relates only to the determination of block order and is irrelevant to the preceding feature of claim 5, as explained in the example of Tyan, col. 13, lines 61-67 and Tyan, col. 14, lines 1-7.

Based on the preceding arguments, Applicants respectfully maintain that Tyan does not anticipate claim 5, and that claim 5 is in condition for allowance.

Claim 6

Applicants respectfully contend that Tyan does not anticipate claim 6, because Tyan does not teach each and every feature of claim 6.

As a first example of why Tyan does not teach each and every feature of claim 6, Tyan does not teach the following feature of claim 6: "including an x coordinate of an origin in the set of x coordinates".

In relation to said first example, the Examiner argues that Tyan, col. 12, line 65 - col. 13, line 5 teaches the preceding feature of claim 6 by reciting: "The row span number is determined to be the number of horizontal grandchildren plus one. The block to which the row span number is assigned is selected to be the first non-vertical child, or the first grandchild that does not have aa horizontal sibling. If a grouping is selected to be assigned the column span number or the row span number, the assignment passes to the first block in that grouping."

In response to the Examiner's argument relating to said first example, Applicants maintain that in Tyan, col. 12, line 65 - col. 13, line 5 does not disclose anything pertaining to "including an x coordinate of an origin in the set of x coordinates".

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As a second example of why Tyan does not teach each and every feature of claim 6, Tyan does not teach the following feature of claim 6: "including a y coordinate of an origin in the set of y coordinates".

In relation to said second example, the Examiner argues that Tyan, col. 12, lines 60-65 teaches the preceding feature of claim 6 by reciting: "The column span number is determined to be the number of children of the horizontal grandchild. The block to which the column span number is assigned is selected to be the first nonhorizontal grandchild that has a horizontal sibling, or the first great-grandchild whose parent has a horizontal sibling.."

In response to the Examiner's argument relating to said second example, Applicants maintain that in Tyan, col. 12, lines 60 - 65 does not disclose anything pertaining to "including a y coordinate of an origin in the set of y coordinates".

As a third example of why Tyan does not teach each and every feature of claim 6, Tyan does not teach the following feature of claim 6: "determining a number of elements in the set of x coordinates and a number of elements in the set of y coordinates".

In relation to said third example, the Examiner argues that Tyan, col. 13, lines 54-60 teaches the preceding feature of claim 6 by reciting: "Step S509 will now be discussed with reference to FIG. 11B. As shown in FIG. 11B, two general situations might occur in which the block order obtained in step 5505 will have to be rearranged to accommodate the way HTML processes table data (i.e., down row by row, in sequence). In each, a row span block is to the right of and horizontally adjacent to a column span block.."

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In response to the Examiner's argument relating to said third example, Applicants maintain that in Tyan, col. 13, lines 54 - 60 describes block ordering, but does not disclose anything pertaining to "determining a number of elements in the set of x coordinates and a number of elements in the set of y coordinates".

As a fourth example of why Tyan does not teach each and every feature of claim 6, Tyan does not teach the following feature of claim 6: "creating an HTML table ... having a number of columns determined by the number of elements in the set of x coordinates, wherein ... for each column of the HTML table a column width is computed from elements of the set of x coordinates".

In relation to said fourth example, the Examiner argues that Tyan, col. 13, lines 54-60 teaches the preceding feature of claim 6 by reciting: "Step S509 will now be discussed with reference to FIG. 11B. As shown in FIG. 11B, two general situations might occur in which the block order obtained in step 5505 will have to be rearranged to accommodate the way HTML processes table data (i.e., down row by row, in sequence). In each, a row span block is to the right of and horizontally adjacent to a column span block.."

In response to the Examiner's argument relating to said fourth example, Applicants maintain that in Tyan, col. 13, lines 54 - 60 describes block ordering, but does not disclose anything pertaining to "having a number of columns determined by the number of elements in the set of x coordinates". Furthermore, Applicants maintain that the disclosure in Tyan, col. 13, lines 54-60, in relating only to the determination of block order, is irrelevant to computing a column width from elements of the set of x coordinates.

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Based on the preceding arguments, Applicants respectfully maintain that Tyan does not anticipate claim 6, and that claim 6 is in condition for allowance.

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CONCLUSION

Based on the preceding arguments, Applicants respectfully believe that all pending claims and the entire application meet the acceptance criteria for allowance and therefore request favorable action. If the Examiner believes that anything further would be helpful to place the application in better condition for allowance, Applicants invites the Examiner to contact Applicants' representative at the telephone number listed below. The Director is hereby authorized to charge and/or credit Deposit Account No. 09-0457.

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